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**Attorneys for Defendants EQUIFAX
INFORMATION SERVICES LLC**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

NOEMIA CARVALHO, on behalf of herself) Case No. 5:08-CV-01317-JF
and other similarly situated people,)
Plaintiff,)
v.)
CREDIT CONSULTING SERVICES, INC.,) MOTION FOR EXTENSION OF TIME
dba CCS, EQUIFAX CREDIT) FOR DEFENDANT EQUIFAX
INFORMATION SERVICES, LLC,) INFORMATION SERVICES LLC TO FILE
EXPERIAN INFORMATION SOLUTIONS,) ITS RESPONSE TO PLAINTIFF'S
INC., TRANS UNION LLC and DOES 1-50,) MOTION TO REMAND
inclusive,)
Defendants.)

Hearing: June 20, 2008
Time: 9:00 a.m.
Judge: Jeremy Fogel
Courtroom 3, 5th Floor
San Jose, California

COMES NOW Defendant Equifax Information Services LLC (“Equifax”), and pursuant to Local Rule 6-3, hereby requests an extension of time for Equifax to file its response to Plaintiff’s Motion to Remand as follows:

1. Plaintiff's Motion is scheduled for a hearing on June 20, 2008. Pursuant to Local Rule 7-3, Equifax's opposition to the motion must be served and filed not less than 21 days before the hearing, on May 30, 2008.

2. Equifax's attorney, Barry Goheen (Application for Admission *Pro Hac Vice* recently filed) has taken the lead in preparing the response and plans to attend the hearing on the

motion on June 20. Unfortunately, Mr. Goheen's mother is seriously ill and he has had to leave town to be with her, so that he is unable to complete the response for filing tomorrow.

3. Because of this hardship, Equifax requests an extension of time for Equifax to file its response to June 6, 2008.

4. No other extensions have been requested in this matter and this extension will not effect the hearing date.

5. Equifax attempted to obtain Plaintiff's consent to this extension by telephone and multiple emails earlier today. However, Plaintiff's attorney, Mr. Bochner, has been unavailable. Equifax is filing this motion before receiving Mr. Bochner's response to the request for stipulation because of the urgency of the matter, with the response deadline tomorrow, and the last-minute, unexpected nature of this hardship.

6. A Declaration in Support of this Motion pursuant to Local Rule 6-3 is being filed herewith.

Respectfully submitted, this 29th day of May, 2008.

NOKES & QUINN

/s/Thomas P. Quinn, Jr.

THOMAS P. QUINN, JR.

Attorneys for Defendants EQUIFAX,
INFORMATION SERVICES LLC

1 **CERTIFICATE OF SERVICE**

2 CARVALHO v DEFENDANT EQUIFAX, et al, CASE NO: 5:08-CV-01317-JF

3 I, the undersigned, certify and declare that I am over the age of 18 years, employed in the
4 County of Orange, State of California, and not a party to the above-entitled cause.

5 On May 29, 2008. I served a true copy of the

6 **MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S
7 MOTION TO REMAND; [PROPOSED] ORDER**

8 [] By depositing it in the United States Mail in a sealed envelope with the postage
9 thereon fully prepaid to the following;

10 [X] By ECF: On this date, I electronically filed the following document(s) with the
11 Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to
12 all other parties appearing on the docket sheet;

13 Ron Keith Bochner
14 Law Office of Ron Bochner
15 3333 Bowers Avenue, Suite 130
16 Santa Clara, CA 95054

17 Deanna L. Johnston
18 Kelli A. Crouch
19 Jones Day
20 555 California Street, 26th Floor
21 San Francisco, CA 94104-1500

22 Stephen Julian Newman
23 Brian C. Frontino
24 Strook & Strook
25 2029 Century Park East
26 Los Angeles, CA 90067

27 I hereby certify that I am employed in the office of a member of the Bar of this Court at
28 whose direction the service was made.

29 I hereby certify under the penalty of perjury that the foregoing is true and correct.

30 /s/

31 YVONNE M. HOMAN